

David G. Banes, Esq.  
O'Connor Berman Dotts & Banes  
Smith and Williams  
Second Floor, Marianas Business Plaza  
P.O. Box 501969  
Saipan MP 96950  
Tel. (670) 234-5684  
Facsimile No. (670) 234-5683

Attorneys for Plaintiff Modesta Manglona Nadar

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

MODESTA MANGLONA NADAR,	)	CIVIL CASE NO. 07-0023
	)	
Plaintiff,	)	
	)	
vs.	)	CASE MANAGEMENT
	)	CONFERENCE STATEMENT
EFREM S. TAIMANAO dba JOE &	)	
SON'S ENTERPRISES,	)	
	)	Judge: Munson, Chief Judge
Defendant.	)	Date: September 5, 2007
	)	Time: 10:00 a.m.
	)	
	)	

---

COMES NOW, Plaintiff, by and through her attorneys O'Connor Berman Dotts & Banes and Smith and Williams, and in accordance with Rule 16(b) and (c), Fed.R.Civ.Pro. and Local Rule 16(e)(2) hereby submits her Case Management Conference Statement.

- a. Defendant Efren S. Taimanao dba Joe & Son's Enterprises has been duly served and the answer has been filed.
- b. Plaintiff believes the Court has jurisdiction and the venue properly lies with this Court as well.
- c. Plaintiff believes this should be assigned to the standard track.

1           d.       Plaintiff anticipates he may file a Motion for Summary Judgment at the close of  
2       discovery for judgment as a matter of law as to liability.

3  
4           e.       Plaintiff expects to conduct extensive discovery.

5  
6           f.       Plaintiff requests that the Court set a settlement conference at the earliest possible  
7       date so that the parties do not incur litigation expenses perhaps needlessly. Plaintiffs suggest that  
8       the trial in this matter be scheduled for July 30, 2008 with the discovery cut-off of March 30,  
9       2008 and the pretrial be set for July 15, 2008.

10  
11          g.       Plaintiff does not anticipate the need for any special procedures.

12  
13          h.       Plaintiff does not anticipate the need for any modification of the standard pretrial  
14       procedures specified by Rule 16, Fed.R.Civ.Pro.

15  
16          i.       Plaintiff expects that there is a reasonable chance this matter will settle if a settlement  
17       conference is set before the parties incur substantial litigation expense.

18  
19          j.       Plaintiff at this time does not anticipate the need for any other matter that may be  
20       conducive to the just, efficient and economical determination of this proceeding.

21  
22          k.       Plaintiff proposes the following scheduling of dates:

- 23  
24               1. Joinder of All Parties: October 15, 2008.  
25               2. Motion to Amend: October 31, 2008.  
26               3. Discovery Cut-Off: March 30, 2008.  
27               4. Status Conferences: In December of 2007.  
28               5. Discovery Motion Hearing Date: April 2008.

6. Dispositive Motion Cut-Off: April 30, 2008.
7. Dispositive Motion Hearing Date: In April of 2008.
8. Settlement Conference: December 2007 and again in February of 2008.
9. Joint Pretrial Order: Seven days prior to the actual trial date.
10. Final Pretrial Conference: Seven days prior to the actual trial date.
11. Trial: In July of 2008.

Dated: September 3, 2007.

Respectfully submitted,

SMITH and WILLIAMS  
O'CONNOR BERMAN DOTTS & BANES  
Attorneys for Plaintiff Modesta M. Nadar

By: /s/ \_\_\_\_\_  
David G. Banes

3332-01-070903-CaseMgmtConfStatement-epv